

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COMMANDER EMILY SHILLING, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

No. 2:25-cv-241-BHS

STIPULATED MOTION FOR LEAVE
TO FILE OVERLENGTH BRIEFS

NOTE ON MOTION CALENDAR:
FEBRUARY 18, 2025

The Parties, by and through their undersigned counsel, hereby respectfully request an order permitting them to file overlength briefs regarding Plaintiffs' forthcoming Motion for Preliminary Injunction. This stipulated motion is brought pursuant to Local Rules W.D. Wash. LCR 7(f) and is noted for same day consideration pursuant to Local Rules W.D. Wash. LCR 7(d)(1).

Pursuant to the Local Civil Rules, "motions for preliminary injunction... and briefs in opposition shall not exceed 8,400 words, [and] [r]eply briefs shall not exceed 4,200 words." Local Rules W.D. Wash. LCR 7(e)(3). The Rules provide that page limit and word count requirements may only be exceeded by court order or rule. *See* Local Rules W.D. Wash. LCR 7(e), (f).

The Parties request leave to file overlength preliminary injunction briefing as follows:

- 10,000 words for the Motion;

- 10,000 words for the Opposition Brief;
- 5,000 words for the Reply Brief.

The Parties agree that an order increasing the word count is necessary due to the complexity of the matters raised in Plaintiffs' Complaint, which involves eight plaintiffs, ten defendants, four causes of action, and raises multiple issues of constitutional law.

It is so stipulated, by and between the Parties.

Pursuant to Local Rules W.D. Wash. LCR 7(e)(6), I certify that this memorandum contains 192 words, in compliance with the Local Civil Rules.

DATED this 18th day of February 2025.

Stipulated and Agreed by:

By: s/ Matthew P. Gordon
 Matthew P. Gordon, WSBA No. 41128
 Abdul Kallon, WSBA No. 60719
Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, Washington 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000
 E-mail: MGordon@perkinscoie.com
 E-mail: AKallon@perkinscoie.com

Danielle Sivalingam (*pro hac vice*)
Perkins Coie LLP
 505 Howard Street, Suite 1000
 San Francisco, CA 94105-3204
 Telephone: 415.344.7000
 Facsimile: 415.344.7050
 E-mail: DSivalingam@perkinscoie.com

Mary Grace Thurmon (*pro hac vice*)
 Bo Yan Moran (*pro hac vice*)
Perkins Coie LLP
 3150 Porter Drive
 Palo Alto, CA 94304-1212
 Telephone: 650.838.4300
 Facsimile: 650.838.4350
 E-mail: MTthurmon@perkinscoie.com
 E-mail: BMoran@perkinscoie.com

Gabriella Romanos Abihabib (*pro hac vice*)
Perkins Coie LLP
 1155 Avenue of the Americas, 22nd
 Floor
 New York, NY 10036-2711
 Telephone: 212.262.6900
 Facsimile: 212.977.1649
 E-mail: GRomanos@perkinscoie.com

Attorneys for Plaintiffs

Sasha Buchert (*pro hac vice*)
**Lambda Legal Defense and
 Education Fund, Inc.**
 815 16th St. NW, Suite 4140
 Washington, DC 20006
 Telephone: 202.804.6245
 Facsimile: 855.535.2236
 E-mail: SBuchert@lambdalegal.org

By: s/ John Robinson

BRETT A. SHUMATE
 Acting Assistant Attorney General

ALEXANDER K. HAAS
 Director, Federal Programs Branch

JEAN LIN
 Special Litigation Counsel

JASON C. LYNCH
 JOHN ROBINSON
 ELIZABETH B. LAYENDECKER
 Trial Attorneys
 United States Department of Justice
 Civil Division, Federal Programs
 Branch
 1100 L Street NW
 Washington, DC 20005
 Telephone: 202.616.8489
 Facsimile: 202.514.1359
 Jean.Lin@usdoj.gov
 Jason.Lynch@usdoj.gov
 John.J.Robinson@usdoj.gov
 Elizabeth.B.Layendecker@usdoj.gov
 v

Attorneys for Defendants

1 Jennifer C. Pizer (*pro hac vice*)
2 **Lambda Legal Defense and**
3 **Education Fund, Inc.**
4 800 South Figueroa Street, Suite 1260
5 Los Angeles, CA 90017
6 Telephone: 213.382.7600
7 Facsimile: 855.535.2236
8 E-mail: JPizer@lambdalegal.org

9 Camilla B. Taylor (*pro hac vice*)
10 Kenneth Dale Upton, Jr. (*pro hac vice*)
11 **Lambda Legal Defense and**
12 **Education Fund, Inc.**
13 3656 N Halsted St.
14 Chicago, IL 60613
15 Telephone: 312.663.4413
16 Facsimile: 855.535.2236
17 E-mail: CTaylor@lambdalegal.org
18 E-mail: KUpton@lambdalegal.org

19 Omar Gonzalez-Pagan (*pro hac vice*)
20 **Lambda Legal Defense and**
21 **Education Fund, Inc.**
22 120 Wall Street, 19th Floor
23 New York, NY. 10005-3919
24 Telephone: 212.809.8585
25 Facsimile: 855.535.2236
26 E-mail: OGonzalez-Pagan@lambdalegal.org

Kell Olson (*pro hac vice*)
Lambda Legal Defense and
Education Fund, Inc.
3849 E Broadway Blvd, #136
Tucson, AZ 85716
Telephone: 323.370.6915
Facsimile: 855.535.2236
E-mail: KOlson@lambdalegal.org

Attorneys for Plaintiffs

Sarah Warbelow (*pro hac vice*)
Cynthia Weaver (*pro hac vice*)
Ami Patel (*pro hac vice*)
Human Rights Campaign
Foundation
1640 Rhode Island Ave. N.W.
Washington, DC 20036
Telephone: 202.527.3669
Facsimile: 202.347.5323
E-mail: Sarah.Warbelow@hrc.org

1 E-mail: Cynthia.Weaver@hrc.org
2 E-mail: Ami.Patel@hrc.org

3 *Attorneys for Plaintiffs*
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26